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EX PARTE OR LATE FILED



May 29, 1998

**Ex Parte**

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street, N.W. Rm. 222  
Washington, D.C. 20554

RECEIVED

MAY 29 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**Re: CC Docket 97-181**

Ms. Salas:

Please be advised that yesterday, May 28, 1998, Joseph DiBella, Robert McDonnell, and I met with Neil Fried and Tamara Preiss of the Competitive Pricing Division to discuss the above referenced proceeding. The attached material was used for discussion.

Please enter this letter and attachment into the record as appropriate. Should you have any questions please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joseph J. Mulleri".

Attachment

cc: N. Fried  
T. Preiss

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# **BELL ATLANTIC'S DEFINITION OF NON-PRIMARY LINES**

Presentation to the FCC

May 28, 1998

## **BELL ATLANTIC'S DEFINITION OF PRIMARY LINE**

- The only line provided to a residential customer (billing name) at that location
- The line designated as primary by the billing name customer at the point of ordering service; or
- The first line installed by Bell Atlantic or a reseller

# **ADVANTAGES OF BELL ATLANTIC'S DEFINITION**

- Clear and precise
- Avoids inconsistent treatment among customers
- Allows use of existing records
- Avoids intrusive information gathering
- Captures non-primary lines which are billed on separate accounts but which are in the same billing name

# **ADVANTAGES OF BELL ATLANTIC'S DEFINITION OVER LOCATION DEFINITION**

- Non-intrusive regarding service to multiple accounts at a location - considers alternative living arrangements
- Avoids penalizing individuals who could be inappropriately classified as non-primary line customers
- Minimizes customer confusion, inquiries and complaints

## **REVISIT THE NON-PRIMARY PICC AND EUCL ISSUE**

The FCC should revisit the residential customer end user distinction.

- While well-intentioned, the non-primary line designation has caused customer confusion.
- The non-primary EUCL charge is perceived as a rate increase by the end user--if noticed at all. Lines are usually billed together, e.g., 2 lines totals \$8.50. Is it \$4.25 apiece?
- The non-primary PICC charge to the IXC has only added to the confusion--the IXCs pass them on as averaged account, or per line, charges, e.g.:
  - AT&T - \$.95 per account
  - MCI - \$1.07 per account
  - Sprint - \$.80 per account
- IXC now has added reasons to dispute the PICC bill.